

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GILBERTO M. ESPINOZA,

Plaintiff,

v.

SCRANTON RECOVERY GROUP, LLC,

Defendant.

Case No. 3:23-cv-00902-N

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT

To the Clerk of the U.S. District Court for the Northern District of Texas

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff, GILBERTO M. ESPINOZA, requests that the Clerk of this Honorable Court enter the Default of Defendant, SCRANTON RECOVERY GROUP, LLC, for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure, and as supported from the affidavit of Nathan C. Volheim, Esq., attached hereto.

Dated: June 12, 2023

Respectfully submitted,

s/ Nathan C. Volheim

Nathan C. Volheim, Esq. #6302103

Counsel for Plaintiff

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Plaintiff, certifies that on June 12, 2023, he caused a copy of the foregoing PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT, to be served by U.S. Priority mail and electronic mail to:

Scranton Recovery Group, LLC
6348 Transit Road
Suite 3
Depew, NY 14043

Scranton Recovery Group, LLC
c/o Registered Agent
United States Corporation Agents, Inc.
7014 13th Avenue
Suite 202
Brooklyn, NY 11228

s/ Nathan C. Volheim
Nathan C. Volheim, Esq.